

**REDACTED DOCUMENTS  
RELATED TO DOCKET 7944**

**7944 - Plaintiffs' Controverting Statement of Facts in  
Opposition to Bard's Motion for Partial Summary  
Judgement as to Doris Jones**

**REDACTED EXHIBITS:**

**Exhibit 5: Excerpts of 2/3/17 Deposition of Alfred Jones, Sr.; and**

**Exhibit 6: Excerpts of 8/5/17 Deposition of [REDACTED], M.D.**

**REDACTED DOCUMENTS  
RELATED TO DOCKET 7944**

**Exhibit 5**  
**Filed Redacted**

Page 1

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE DISTRICT OF ARIZONA  
3  
4

5 In re Bard IVC Filters Products  
6 Liability Litigation  
7  
8

9 NO. MD-15-02641  
10  
11

12 PHX-DGC  
13  
14

15 DEPOSITION OF  
16 [REDACTED]  
17

18 February 3, 2017 - 10:08 a.m.  
19

20 Ellis, Painter, Ratterree & Adams  
21

22 2 E. Bryan Street  
23

24 Savannah, Georgia  
25

Deborah K. Lingonis, RPR, CCR 2883

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**REDACTED DOCUMENTS  
RELATED TO DOCKET 7944**

**Exhibit 6  
Filed Redacted**

8 DO NOT DISCLOSE  
9 SUBJECT TO FURTHER CONFIDENTIALITY REVIEW

12 VIDEOTAPED DEPOSITION OF [REDACTED] M.D.

13 August 5, 2017

## 14 Winston-Salem, North Carolina

15 8:03 a.m.

19

23      Reported by: Karen Kidwell, RMR, CRR

24 GOLKOW LITIGATION SERVICES

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25 [deps@golkow.com](mailto:deps@golkow.com)

1       in the course of her care would have been rather  
2       different than the course we did take. [REDACTED]  
[REDACTED]  
[REDACTED]

5           Q.     How did that direct the course that you  
6       took?

7           A.     It then allowed us to basically consult  
8       certain other physicians, specialists of vasculature  
9       and radiographic anatomy, [REDACTED]  
[REDACTED]  
[REDACTED]

12          Q.     Did the CT angiogram, including the  
13       impressions, provide you any information that helped  
14       you understand the complaints [REDACTED]  
15       [REDACTED]

16          A.     [REDACTED]  
17       [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

23           However, I would like to note that despite  
24       this, we still continued to work the patient up for  
25       very common presenting things, like a heart attack,

1 especially with contrast, such as this.

2 Q. When you eventually eliminated the other  
3 conditions, [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

7 A. I will say that again, having never seen a  
8 presentation like this, and the medical literature  
9 not being very robust on these types of  
10 presentations, [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

16 Q. So what was your next step? Did you order  
17 additional tests, or what did you order?

18 A. So having the tests available ahead of us,  
19 we felt that our next best step, given the fact that  
20 we saw [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED] we felt it best to obtain counsel from an expert  
24 in the field of vasculature, anatomy, and radiology,  
25 [REDACTED]